



DIVISION OF
MARKET REGULATION

UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
WASHINGTON, D.C. 20549



04009280

February 17, 2004

Mr. Brian W. Keane
Managing Director
Claris Capital LLC
8300 Greensboro Dr., Suite 720
McLean, VA 22102

PROCESSED

MAR 11 2004

THOMSON
FINANCIAL

Act	Securities Exchange Act of 1934
Section	17(a)
Rule	17a-5
Public Availability	2/16/2004

Re: Annual Audited Financial Statement Filing Requirements Under Rule 17a-5

Dear Mr. Keane:

We have received your letter dated January 6, 2004, in which you request on behalf of Claris Capital LLC (the "Firm"), relief from the requirement that the Firm file a certified annual report of financial statements pursuant to Rule 17a-5 of the Securities Exchange Act of 1934 (17 CFR 240.17a-5) for the fiscal year ending December 31, 2003.

I understand the following facts to be pertinent to the Firm's request. The Firm's registration as a broker-dealer with the Securities and Exchange Commission ("Commission") became effective on November 17, 2003. The Firm is required, pursuant to paragraph (d) of Rule 17a-5, to file a certified annual report of financial statements on a calendar or fiscal year basis. The report must be as of the same fixed or determinable date each year unless a change is approved by the Firm's designated examining authority. The Firm chose December 31 as its year-end. Accordingly, an audited report of the Firm's financial statements must be prepared as of December 31, 2003. Because the Firm's registration with the Commission became effective on November 17, 2003, you have requested an exemption from filing annual audit reports for the year-ended December 31, 2003.

Based on the foregoing facts, the Division of Market Regulation ("Division") will not recommend enforcement action to the Commission if the Firm does not file audited financial statements as of December 31, 2003. However, the annual report for the year ending December 31, 2004, must cover the entire period from November 17, 2003, the effective date of the Firm's registration with the Commission.

1283280

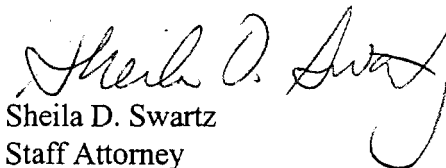
Mr. Brian W. Keane

February 17, 2004

Page 2

You should understand that this letter expresses a staff position with respect to enforcement only and does not purport to state any legal conclusion on this matter. The Division's position is confined to the facts as described herein. Any material change in circumstances may warrant a different conclusion and should be brought immediately to the Division's attention.

Sincerely,


Sheila D. Swartz
Staff Attorney

cc: Susan Demando, NASD Regulation